

AFFIDAVIT

STATE OF WEST VIRGINIA

COUNTY OF RALEIGH, to-wit:

I, Brandon S. Holistine, being duly sworn, hereby depose and state as follows:

1. I am a United States Postal Inspector employed with the United States Postal Inspection Service (USPIS) since April 2017. I am presently assigned to the USPIS Charleston, WV domicile where my responsibilities include the investigation of crimes involving the United States Postal Service (USPS) and crimes furthered through the use of the United States Mail. This includes the investigation of controlled substances and narcotics proceeds sent through the U.S. Mail. Prior to my assignment in the Charleston, WV domicile, I was assigned to the USPIS Cleveland, OH field office where I also conducted investigations involving controlled substances and narcotics proceeds sent through the U.S. Mail and was assigned as a task force agent with U.S. Drug Enforcement Administration.

2. This affidavit is made in support of an application for a search warrant to search the contents of USPS Priority Mail Package bearing tracking number “9405 5112 0620 9318 5189 70” with a return address of “KAIT DWYER 8120 BILLOWVISTA DR PLAYA DEL REY CA 90293” and a delivery address of “ANDREW JACKSON 307 1/2 MORRIS AVE BECKLEY WV 25801-6827” (hereinafter referred to as “SUBJECT PARCEL”). The SUBJECT PARCEL is a brown shipping box with approximate dimensions of 15”x15”x15”. The SUBJECT PARCEL was mailed on November 20, 2023, from Playa Del Dey, CA 90293 with \$62.72 postage affixed. The SUBJECT PARCEL is currently located at 1000 Centre Way, South Charleston, WV 25309.

3. The information contained in this affidavit is based on information I have gained from my investigation, my personal observations, my training and experience, and information related to me by other law enforcement agents and witnesses.

4. Drug trafficking background gained over the years has shown that drug dealers and drug traffickers utilize the USPS for shipping narcotics proceeds and controlled substances, including but not limited to cocaine, heroin, methamphetamine, marijuana, and pharmaceuticals. The use of Priority Mail Express, Priority Mail and First Class Mail are favored because of the reliability, anonymity, speed (overnight service), minimal cost, and ability to track the mail piece.

5. Through experience gained in drug investigations by Postal Inspectors and other law enforcement agents, and through information provided by individuals who have been involved in buying, selling, and shipping drugs by Priority Mail Express, Priority Mail and other types of shipments, USPS has established a drug profile policy to screen mail packages for narcotics and/or controlled substances. The profile characteristics include peculiarities in labeling and unusual packaging techniques as well as other considerations. The reason that handwritten labels are of interest is that the vast majority of premium mail services such as Priority Mail Express and Priority Mail involves business-to-business or business-to-person correspondence and features typewritten or computer-generated labels. Person-to-person correspondence (and the handwritten labels attendant thereto) accounts for a very small minority of total Priority Mail Express and Priority Mail traffic.

6. Postal Inspectors, Special Agents of the Drug Enforcement Administration (DEA) and other intelligence sources have identified Arizona, Texas, California, Florida, Georgia, Oregon, Michigan, Nevada, New Jersey and New York as major source states for illegal drugs flowing into areas within the Southern District of West Virginia.

7. From my experience, training, and knowledge of drug shipments through the United States Mail I am aware that drug traffickers frequently use fictitious names and addresses on the return address portion of the mailing label both to remain anonymous and avoid detection. Some return addresses have been found to be legitimate addresses, but the actual resident at those locations is either fictitious or non-existent. I am also aware that the address of the person that the mail piece is addressed to is generally not fictitious because a valid address is necessary for the package to be delivered. However, at times the true name of the addressee may be altered or ignored in favor of an alias or code name to better disguise their identity from law enforcement.

8. Based upon my knowledge, training, and experience I know that drug traffickers using the USPS often use unusual packaging techniques. These may include excessive taping or wrapping or by including within the package items having strong odors in an effort to contain or mask the odor of controlled substances in order to avoid detection by trained narcotics dogs.

9. Your affiant knows based on training and experience as well as consultation with other agents, that U.S. Mail is often used by narcotic traffickers to transport controlled substances, as well as U.S. currency derived from the distribution of controlled substances, either as payment or proceeds. Your affiant knows based on training and experience that USPS Priority Mail Express and Priority Mail are commonly used to transport controlled substances because narcotic traffickers can track the parcels, and control dispatch times and locations.

BACKGROUND OF INVESTIGATION

10. On November 22, 2023, while reviewing USPS electronic records relating to shipments of parcels to the Southern District of West Virginia from known sources states such as California, your affiant identified USPS Priority Mail Package bearing tracking number “9405 5112 0620 9318 5189 70” with a return address of “KAIT DWYER 8120 BILLOWVISTA DR

PLAYA DEL REY CA 90293” and a delivery address of “ANDREW JACKSON 307 1/2 MORRIS AVE BECKLEY WV 25801-6827” (SUBJECT PARCEL). Based on my training and experience, your affiant believed the package to be consistent with the size, weight and mailing characteristics of packages containing narcotics proceeds and/or controlled substances.

11. On November 23, 2023, Postal Inspectors identified the SUBJECT PARCEL had arrived at the Charleston, WV Processing and Distribution Center (PDC). On the same date, Postal Inspectors traveled to the Charleston, WV PDC identified that the SUBJECT PARCEL bore a computer-generated label, bore fictitious name and address information, and was mailed from Playa Postal Center located at 8117 W Manchester Ave, Playa Del Rey, CA 90293. Your affiant knows that that Playa Postal Center is a commercial mail receiving agency (CMRA), which are commonly utilized by used by drug traffickers to ship and receive illicit proceeds and narcotics via the U.S. Mail. Finally, you affiant noted the SUBJECT PARCEL was mailed from California, a known source state for illicit drugs coming into the Southern District of West Virginia.

12. Your affiant made inquiries with CLEAR, an electronic database that has proven reliable in previous investigations in determining the legitimacy of name, address, and phone number information, regarding the return address of “KAIT DWYER 8120 BILLOWVISTA DR PLAYA DEL REY CA 90293”. CLEAR showed no such name associated with that address. Your affiant also made inquiries with CLEAR regarding the delivery address of “ANDREW JACKSON 307 1/2 MORRIS AVE BECKLEY WV 25801-6827”. CLEAR showed no such name associated with that address.

13. On November 23, 2023, your affiant searched USPIS law enforcement records relating to the address of 307 1/2 MORRIS AVE, BECKLEY, WV 25801. Your affiant identified an seizure by Postal Inspectors of the Charleston, WV Domicile in September 2023, of approximately

1055.8 grams white powder which field tested positive for fentanyl, from a USPS Priority Mail Parcel addressed to Ashley Smith, 307 Morris Ave, Beckley, WV 25801 and bearing a return address of Marisa Castellucci, 16010 Halldale Ave, Gardena, CA 90247-4598. Your affiant noted that the address of 307 Morris Ave and 307 1/2 Morris Ave are each a single unit part of a two (2) unit duplex.

14. On November 24, 2023, Det. E.S. Johnson, Charleston Police Department, provided his trained narcotic detection dog, "Rex". Rex has experience with narcotics investigations including drug parcels and was last certified April 2023. The SUBJECT PARCEL was placed in a line-up with four (4) additional boxes of similar shapes and sizes. Rex conducted an exterior examination of all the parcels. Det. Johnson informed your affiant that Rex positively alerted on the SUBJECT PARCEL indicating the presence of the odor of a controlled substances.

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15. Based on the information contained herein, your affiant maintains there is probable cause to believe that the SUBJECT PARCEL - USPS Priority Mail Package bearing tracking number "9405 5112 0620 9318 5189 70" - contains controlled substances, and/or proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Sections 841(a)(1), 843(b) and 846.

Further your affiant sayeth naught.



BRANDON S. HOLESTINE
POSTAL INSPECTOR

On the 24th Day of November 2023, this affidavit was sworn to by the affiant, who did no more than attest to its contents pursuant to Crim. R. 4.1 (b)(2)(A), by telephone after a document was transmitted by email, per Crim. R. 4.1.



OMAR J. ABOULHOSN
UNITED STATES MAGISTRATE JUDGE